

In The Matter Of:
LaSheena Sipp-Lipscomb, et al. vs.
Einstein Physicians Pennypack Pediatrics, et al.

Pam Brown
July 23, 2021

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1 two minutes and 41 seconds, and it's an outgoing
2 call from a mobile telephone, and MOC stands for
3 mobile originating call and the mobile number is as
4 I said before (267) 310-8421, which I'll represent
5 to you is mobile number that was being used by the
6 minor child, Andres Gardin, Jr.'s mother, Lasheena
7 Sipp-Lipscomb, and the number that was dialed was
8 215-698-9200.

9 Do you understand 215-698-9200 to be an
10 Einstein extension?

11 A. Yes, it would be the main number for Pennypack
12 East.

13 Q. Pennypack East would be Pennypack Pediatrics,
14 correct?

15 A. Correct.

16 Q. Are you aware that Miss Lipscomb placed a
17 phone call on July 23 to Pennypack Pediatrics?

18 MR. ZACK: We'll stipulate to whatever
19 this document states, but she's not going to
20 endorse it or ratify it.

21 MR. JOKELSON: I understand it. I just
22 want to know if she's aware of any phone
23 call by Miss Lipscomb.

24 MR. ZACK: I understand the question and
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1 Are you the person that's most
2 knowledgeable concerning the policies, procedures,
3 processes, guidelines, and protocols in effect on
4 July 23, 2019 for conducting, following up on and
5 noting, recording, Pennypack patient telephone
6 calls/encounters and telephone triage?

7 A. Yes.

8 Q. Are you also the person for determining the
9 acuity of Pennypack patient calls?

10 A. I'm not the person to determine acuity because
11 I'm not clinical. I'm only operations.

12 MR. ZACK: He's talking about the
13 policies for that.

14 THE WITNESS: The policies, yes.

15 BY MR. JOKELSON:

16 Q. And the policies, procedures, processes,
17 guidelines, and protocols for providing following
18 up on and noting/recording Pennypack patient
19 telephone advice and instructions?

20 A. Yes.

21 Q. And I take it you're also the person most
22 knowledgeable concerning the identification of
23 Einstein persons responsible for Pennypack patient
24 telephone calls/encounters/triage on July 23,

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1 between 1:00 p.m. and 5:00 p.m. Eastern Daylight
2 Time?

3 A. Yes.

4 Q. And you're also the person most knowledgeable
5 about the protocols, pathways, policies, guidelines
6 and procedures in effect on July 23, 2019 for
7 advising, addressing, and acting upon Pennypack
8 pediatric patient complaints of testicular/scrotal
9 pain and/or swelling?

10 A. Yes, from an operational standpoint only.

11 Q. What does that mean?

12 MR. ZACK: David, she's here to talk
13 about policies. She's making the point that
14 she's not a medical provider.

15 BY MR. JOKELSON:

16 Q. You have no medical background, do you?

17 A. No medical background.

18 Q. What is your education background?

19 A. My education background, I have an MBA.

20 Q. Did you concentrate in a certain area?

21 A. Healthcare administration.

22 Q. And when did you get that MBA?

23 A. 2010.

24 Q. I thought you were going to tell me just last
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22

1 I'm not sure that Pam found that, but
2 that was located and produced to you.

3 BY MR. JOKELSON:

4 Q. Other than that, are you aware of any other
5 written policies, procedures, policies, guidelines,
6 protocols in effect on July 23?

7 A. No.

8 Q. Pursuant to your investigation, were you able
9 to identify Einstein persons responsible for
10 Pennypack patient telephone calls, encounters, and
11 triage between 1:00 p.m. and 5:00 p.m. on July 23?

12 A. Yes.

13 Q. Who were those persons?

14 A. The three triage nurses at that particular
15 time would have been Fran Barlow, Allison /PH-BG
16 Donald.

17 Q. Hold on. You're going too fast for me. How
18 do I spell Barlow?

19 A. BA R L O W.

20 Q. Who else?

21 A. Allison McDonnel.

22 Q. M-C --

23 A. M-C-D-O-N-N-E-L, and don't quote me on that
24 spelling.

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23

1 Q. Who's the third person?

2 A. Patricia Madison, M-A-D-I-S-O-N.

3 Q. Patricia Madison. Are these all nurses?

4 A. They are all nurses.

5 Q. Are they nurse practitioners?

6 A. No.

7 Q. They were responsible for patient telephone
8 calls, encounters, and triage on July 23 of 2019
9 between 1:00 and 5:00 p.m.?

10 A. Yes.

11 Q. Were you able to identify which one of these
12 persons spoke with Miss Lipscomb?

13 A. No.

14 Q. Did you interrogate each one of the three?

15 A. Based on my understanding our legal team did
16 the investigation with them. I did not.

17 Q. Do you know whether anyone was able to
18 identify -- do you know if any of the three of them
19 had a memory of any phone call?

20 A. Based on my understanding they did not.

21 Q. Did they deny the phone call, do you know?

22 MR. ZACK: Wait. Wait. What do you
23 mean "deny the phone call?" They don't have
24 any memory of it. That's the end of the
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1 inquiry.

2 BY MR. JOKELSON:

3 Q. They don't have any memory one way or the
4 other?

5 A. That is correct.

6 Q. But those would be the universe of persons who
7 would have taken any such telephone call, encounter
8 or triage?

9 A. Yes.

10 Q. And there would be no other person?

11 A. No.

12 Q. And then the third area is you're the person
13 most knowledgeable concerning the protocols,
14 pathways, policies, guidelines -- I think I asked
15 you that.

16 Have you been able to locate any
17 protocols, pathways, policies, guidelines or
18 procedures in effect on July 23 advising,
19 addressing, or acting upon pediatric patient
20 complaints of testicular or scrotal swelling or
21 pain?

22 A. That would be -- that would be based on our
23 telephone protocols, Barton Schmitt Telephone
24 Pediatric Protocols.

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